

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN THE MATTER OF THE SEIZURE OF )  
\$1,162.22 IN FUNDS FROM ACCOUNT )  
XXXXXX6486 HELD AT GREYLOCK )  
FEDERAL CREDIT UNION, )  
\$1,206.60 IN FUNDS FROM ACCOUNT )  
XXXXXX6557 HELD AT GREYLOCK )  
FEDERAL CREDIT UNION, )  
\$1,531.53 IN FUNDS FROM ACCOUNT )  
XXXXXX6422 HELD AT GREYLOCK )  
FEDERAL CREDIT UNION, )  
\$4,832.15 IN FUNDS FROM ACCOUNT )  
XXXXXX6799 HELD AT GREYLOCK )  
FEDERAL CREDIT UNION, )  
\$4,995 IN FUNDS FROM ACCOUNT )  
XXXXXX1955 HELD AT GREYLOCK )  
FEDERAL CREDIT UNION, )  
\$1,693.50 IN FUNDS FROM ACCOUNT )  
XXXXXX0826 HELD AT )  
MARBLEHEAD BANK, )  
\$1,957.37 IN FUNDS FROM ACCOUNT )  
XXXXXX3190 HELD AT )  
MARBLEHEAD BANK; AND, )  
ONE ANTIQUE TAMBOUR DESK AND )  
AN ANTIQUE DRUM TABLE, )  
ALL SEIZED ON OCTOBER 13, 2022; )  
ONE 19TH-CENTURY, FRENCH, WALNUT, )  
LOUIS PHILIPPE-STYLE )  
ANTIQUE BIBLIOTHEQUE, )  
SEIZED ON OCTOBER 19, 2022; )  
\$2,722 IN UNITED STATES CURRENCY, )  
\$1,519.43 IN FOREIGN CURRENCY, )  
TREASURER'S CHECK FOR \$5,000, )  
VARIOUS MAISON GOYARD HANDBAGS, )  
AND, MISCELLANEOUS PERSONAL )  
PROPERTY, )  
ALL SEIZED ON OCTOBER 13, 2022; )

M.B.D. No. 23-MC-91238

**MOTION TO EXTEND DEADLINE**  
**FOR THE UNITED STATES TO FILE CIVIL FORFEITURE COMPLAINT**

The United States of America, by its attorney, Rachael S. Rollins, United States Attorney  
for the District of Massachusetts, pursuant to 18 U.S.C. § 983(a)(3)(A), respectfully requests an

extension of time to file a civil complaint against the following seized property:

- a. \$1,162.22 in funds from account xxxxxx6486 held at Greylock Federal Credit Union, seized on October 13, 2022;
- b. \$1,206.60 in funds from account xxxxxx6557 held at Greylock Federal Credit Union, seized on October 13, 2022;
- c. \$1,531.53 in funds from account xxxxxx6422 held at Greylock Federal Credit Union, seized on October 13, 2022;
- d. \$4,832.15 in funds from account xxxxxx6799 held at Greylock Federal Credit Union, seized on October 13, 2022;
- e. \$4,995 in funds from account xxxxxx1955 held at Greylock Federal Credit Union, seized on October 13, 2022;
- f. \$1,693.50 in funds from account xxxxxx0826 held at Marblehead Bank, seized on October 13, 2022;
- g. \$1,957.37 in funds from account xxxxxx3190 held at Marblehead Bank, seized on October 13, 2022;
- h. One antique tambour desk and an antique drum table, seized on October 13, 2022;
- i. One 19th-century, French, walnut, Louis Philippe-style antique bibliotheque, seized on October 19, 2022;
- j. \$2,722 in United States currency, seized on October 13, 2022;
- k. \$1,519.43 in foreign currency, seized on October 13, 2022;
- l. One Treasurer's Check for \$5,000, seized on October 13, 2022,
- m. Various Maison Goyard handbags, seized on October 13, 2022; and,
- n. Miscellaneous personal property, seized on October 13, 2022<sup>1</sup>

(collectively, the "Properties"). A proposed Order to Extend Time to File Civil Forfeiture Complaint

is submitted herewith. The United States, in support of this motion, states as follows:

---

<sup>1</sup> The personal property includes miscellaneous stereo equipment, assorted items of furniture, one Breguet wristwatch, assorted artwork, miscellaneous video equipment, various appliances, assorted electronic equipment, and various Hermes handbags.

1. The Federal Bureau of Investigation (“FBI”) seized the Properties and commenced administrative forfeiture proceedings.
2. On or about January 16, 2023, the FBI received two, separate claims—one from Brian Andrew Bushell asserting an interest in all of the Properties and the other from Tracey Stockton, asserting an interest in the various Maison Goyard handbags.
3. No other person has filed a claim to the Properties as required by law in the nonjudicial civil forfeiture proceeding, and the time within which to file such claims has expired. *See* 18 U.S.C. § 983(a)(2)(A)-(E).
4. On January 25, 2023, the FBI transmitted the claims received in the nonjudicial civil forfeiture proceedings for the Properties to the United States Attorney for the District of Massachusetts, for the purpose of initiating a judicial forfeiture action against the Properties.
5. 18 U.S.C. § 983(a)(3)(A)-(C) states:
  - (A) Not later than 90 days after a claim has been filed, the Government shall file a complaint for forfeiture in the manner set forth in the Supplemental Rules for Certain Admiralty and Maritime Claims or return the property pending the filing of a complaint, except that a court in the district in which the complaint will be filed may extend the period for filing a complaint for good cause shown or upon agreement of the parties.
  - (B) If the Government does not -
    - (i) file a complaint for forfeiture or return the property, in accordance with subparagraph (A); or
    - (ii) before the time for filing a complaint has expired -
      - (I) obtain a criminal indictment containing an allegation that the property is subject to forfeiture; and
      - (II) take the steps necessary to preserve its right to maintain custody of the property as provided in the applicable criminal forfeiture statute,

the Government shall promptly release the property pursuant to regulations promulgated by the Attorney General and may not take any further action

to effect the civil forfeiture of such property in connection with the underlying offense.

(C) In lieu of, or in addition to, filing a civil forfeiture complaint, the Government may include a forfeiture allegation in a criminal indictment. If criminal forfeiture is the only forfeiture proceeding commenced by the Government, the Government's right to continued possession of the property shall be governed by the applicable criminal forfeiture statute.

6. Pursuant to 18 U.S.C. § 983(a)(3)(A)-(C), unless the time is extended by the Court for good cause or upon agreement of the parties, the United States is required to file a complaint for forfeiture against the Properties no later than April 16, 2022.

7. On October 11, 2022, the United States filed a criminal complaint charging Bushell and Stockton with conspiracy to commit wire fraud in violation of 18 U.S.C. § 1349 and conspiracy to commit money laundering in violation of 18 U.S.C. § 1956(h). *See* 22-mj-4506-DHH.

8. On February 16, 2023, the District Court (Saris, J.) granted the United States motion for an extension to indict to May 12, 2023. No. 22-mc-91350-PBS and 22-mc-91531-PBS.

9. The Court may extend the time to file a civil forfeiture action upon agreement of the parties or good cause shown. Prior to filing this motion, on March 30, 2023, the undersigned Assistant United States Attorney contacted counsel of record for Ms. Stockton, Michelle Menken, Esq., about obtaining an agreed upon extension. Counsel indicated that she will shortly be filing a motion to withdraw in the criminal case (which she has since filed), and therefore is unable at this time to provide Ms. Stockton's position on the government's requested extension. The undersigned AUSA also contacted counsel of record for Mr. Bushell, Thomas Dwyer, Esq., on April 3, 2023. Counsel indicated that his firm was in the process of withdrawing their appearance for Mr. Bushell and would forward the request to his client. The government has

heard nothing further.

10. If the United States fails to file a complaint for forfeiture by April 16, 2023, it may not take any further action to effect the civil forfeiture of the Properties.

11. The United States requests an extension of time up to and including June 15, 2023, to further review information in this matter and because there is a pending criminal investigation related to this seizure that may result in the government obtaining a criminal indictment containing an allegation that the Properties are subject to forfeiture.

WHEREFORE, the United States respectfully requests that the Court grant its request and extend the deadline to file a civil forfeiture complaint for an additional 60 days, or up to and until June 15, 2023.

Respectfully submitted,

RACHAEL S. ROLLINS  
United States Attorney

By: /s/ Carol E. Head  
CAROL E. HEAD  
Assistant United States Attorney  
United States Attorney's Office  
1 Courthouse Way, Suite 9200  
Boston, MA 02210  
(617) 748-3100  
carol.head@usdoj.gov

Dated: April 11, 2023